

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X  
:  
UNITED STATES OF AMERICA, :  
:  
- v. - :  
:  
HOSSEIN WASIRI, :  
a/k/a "Frank Wasiri," :  
Defendant. :  
- - - - - X

INDICTMENT

19 Cr. \_\_\_\_

**10 CRIM 423**

COUNT ONE

(Wire Fraud)

The Grand Jury charges:

1. From at least in or about June 2015 up to and including at least in or about January 2018, in the Southern District of New York and elsewhere, HOSSEIN WASIRI, a/k/a "Frank Wasiri," the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, WASIRI, among other things, provided fraudulent bank records to a particular individual ("Victim-1") designed to conceal WASIRI's scheme to embezzle more than \$1,500,000 from Victim-1's business ("Business-1") and, during the commission

**JUDGE CARTER**

thereof, WASIRI transmitted or caused to be transmitted interstate wires into the Southern District of New York, and transmitted or caused to be transmitted while located in the Southern District of New York interstate calls designed to conceal his scheme.

(Title 18, United States Code, Sections 1343 and 2.)

**COUNT TWO**

**(Aggravated Identity Theft)**

The Grand Jury further charges:

2. From at least in or about January 2017, up to and including at least in or about January 2018, in the Southern District of New York and elsewhere, HOSSEIN WASIRI, a/k/a "Frank Wasiri," the defendant, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, WASIRI possessed and used the name, bank account number, and bank card of Victim-1 during and relation to the wire fraud scheme charged in Count One of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2.)

**FORFEITURE ALLEGATION**

3. As a result of committing the offense alleged in Count One of this Indictment, HOSSEIN WASIRI, a/k/a "Frank Wasiri," the defendant, shall forfeit to the United States, pursuant to Title

18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Asset Provision

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
FOREPERSON

6/10/19

  
GEOFFREY S. BERMAN  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA

v.

HOSSEIN WASIRI,  
a/k/a "Frank Wasiri,"

Defendant.

---

INDICTMENT

19 Cr. \_\_\_\_

(18 U.S.C. §§ 1343, 1028A, & 2.)

---

GEOFFREY S. BERMAN  
United States Attorney

---



Foreperson

---

06/10/19

(CA)

INDICTMENT FILED  
WHEEL A - DJ CARTER  
KH PARKER  
USAT